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6 Attorneys for Plaintiff
United States of America

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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12
Plaintiff,
13
v.
14
APPROXIMATELY \$7,500.00 IN U.S.
15 CURRENCY, and
16
APPROXIMATELY \$2,920.00 IN U.S.
17 CURRENCY,
18
Defendants.

CASE NO. 1:20-MC-00090-DAD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

19 It is hereby stipulated by and between the United States of America and potential claimants
20 Brandon Jones and Kiaundra Crawford (“potential claimants”), appearing *in propria persona*, as
21 follows:

22 1. On or about July 8, 2020, potential claimants filed a claim in the administrative forfeiture
23 proceeding with the Federal Bureau of Investigation with respect to the approximately \$7,500.00 in U.S.
24 Currency and approximately \$2,920.00 in U.S. Currency (hereafter “defendant currency”), which was
25 seized on May 12, 2020.

26 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit
27 required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any
28 person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other

1 than the potential claimants have filed a claim to the defendant currency as required by law in the
2 administrative forfeiture proceeding.

3 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
4 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
5 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
6 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of
7 the parties. That deadline was October 6, 2020.

8 4. By Stipulation and Order filed October 9, 2020, the parties stipulated to extend to January
9 4, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
11 forfeiture.

12 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
13 April 4, 2021, the time in which the United States is required to file a civil complaint forfeiture against
14 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
15 forfeiture.

16 6. Accordingly, the parties agree that the deadline by which the United States shall be
17 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
18 alleging that the defendant currency is subject to forfeiture shall be extended to April 4, 2021.

19 Dated: December 28, 2020

McGREGOR W. SCOTT
United States Attorney

21 By: /s/ Kevin C. Khasigian
22 KEVIN C. KHASIGIAN
Assistant United States Attorney

24 Dated: December 28, 2020

25 By: /s/ Brandon Jones
26 BRANDON JONES
27 Potential Claimant
28 (Approved by email on 12/28/20)

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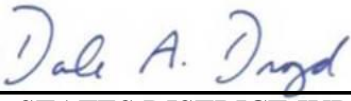
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1 Dated: December 28, 2020

By: /s/ Kiaundra Crawford
KIAUNDRA CRAWFORD
Potential Claimant
(Approved by email on 12/28/20)

4 IT IS SO ORDERED.

5 Dated: **December 29, 2020**


DALE A. INGH
UNITED STATES DISTRICT JUDGE